

**IN THE UNITED STATES DISTRICT  
COURT FOR THE DISTRICT OF  
SOUTH CAROLINA**

IN RE: AQUEOUS FILM-FORMING FOAMS	)	Master Docket No.:
PRODUCTS LIABILITY LITIGATION	)	2:18-mn-2873-RMG

---

CITY OF CAMDEN, et al.,	)	Civil Action No.:
	)	2:23-cv-03230-RMG
<i>Plaintiffs,</i>	)	
	)	
-vs-	)	
	)	
E.I. DUPONT DE NEMOURS AND COMPANY (n/k/a	)	
EIDP, Inc.), et al.	)	
	)	
<i>Defendants.</i>	)	

---

**DECLARATION OF PAUL J. NAPOLI IN SUPPORT OF CLASS COUNSEL'S  
MOTION FOR SANCTIONS AND OTHER RELIEF**

I, Paul J. Napoli, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a member of the law firm Napoli Shkolnik and Co-Lead Counsel of the Plaintiffs' Executive Committee. I submit this declaration in support of Class Counsel's Motion for Sanctions and Other Relief.

2. Attached hereto as Exhibit A is a true and correct copy of a March 9, 2024, email, from Met's Deputy General Counsel, Ms. Jill Teraoka, to Class Counsel.

3. Attached hereto as Exhibit B is a true and correct copy of the March 9, 2024 email correspondence between Class Counsel and Met's outside counsel, Mr. Jeff Kray.

4. Attached hereto as Exhibit C is a true and correct of a March 10, 2024, email correspondence between Class Counsel and Ms. Teraoka.

5. Attached hereto as Exhibit D is a true and correct copy of the content of an email sent from Mr. Tom Dobbins, CEO, Association of Metropolitan Water Agencies to its members.

6. Attached hereto as Exhibit E is a true and correct copy of the unpublished Letter Order filed in *Cole et al. v. NIBCO, Inc.*, No. 3:13-cv-7871 (D.N.J. Apr. 5, 2019).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 15, 2024 in New York, New York.

s/ Paul J. Napoli  
Paul J. Napoli